

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

## SARAH PALIN

Plaintiff,

x

: No. 17 Civ. 4853 (JSR)  
: ECF Case

-against-

THE NEW YORK TIMES COMPANY and JAMES BENNET,

## Defendants.

•

•

2

•

•

x

**MOTION TO WITHDRAW APPEARANCE OF MICHAEL D. SULLIVAN**

Pursuant to Local Civil Rule 1.4, I, Michael D. Sullivan, respectfully submit this Motion to Withdraw as counsel for Defendants The New York Times Company and James Bennet. In support of this Motion, I aver as follows:

1. I was, until recently, senior counsel with the law firm of Ballard Spahr LLP, and counsel to Defendants in the above-captioned matter.

2. Effective June 30, 2021, I have retired from the private practice of law.

3. I have notified Deputy General Counsel for The New York Times Company,

David McCraw, as well as James Bennet, of my retirement and my intention to withdraw as counsel in this action.

4. Defendants are aware and approve of their continued representation by Jay Ward Brown, David L. Axelrod, Thomas B. Sullivan, and Jacquelyn N. Schell of Ballard Spahr LLP.

5. No party will be prejudiced by my withdrawal, and no deadline will be affected.

6. A copy of this motion has been provided to Defendants.

7. I am not asserting a retaining or charging lien.

WHEREFORE, for the foregoing reasons, it is respectfully requested that this Court enter an Order granting my withdrawal from this matter.

Dated: Washington, D.C.  
July 19, 2021

Respectfully submitted,

BALLARD SPAHR LLP

By: /s/ Michael D. Sullivan

Michael D. Sullivan  
1909 K Street, NW, 12th Floor  
Washington, D.C. 20006-1157  
Phone: (202) 661-2200  
Fax: (202) 661-2299  
sullivanm@ballardspahr.com  
*Counsel for Defendants*